Secretary Federal Communications Commission Washington, DC 20554

Re: 05-235

I am a licensed Amateur Radio Operator with an Extra Class License. I was first licensed in 1969. I am also an Electronics Engineer with 40 years of experience in Electronics and RF communications.

I would like to file a comment in favor of the above referenced NPRM. The proposed rule changes are, in my opinion, a very positive step for improvement of the Amateur Radio Service.

In my career as an Engineer, I have worked with many other professionals that have had more than a passing interest in Amateur Radio, but felt that the requirement for demonstrating a knowledge of Morse Code was outdated and useless. This is especially so since the WRC-03, at which treaty requirements for knowledge of Morse code was eliminated. In my opinion, these individuals would have advanced the art of radio communications through their contributions.

An argument in the Amateur Radio community is that by eliminating the Morse code requirement, the FCC will "dumb down" the Amateur Radio Service. I disagree. Knowledge of Morse code doesn't make Amateur Radio Operators any smarter or have any more technical knowledge than someone who doesn't. Another argument is that if you don't know Morse code, you haven't "worked" for you license. This argument is a justification of using Morse code as gate, and in my opinion, a roadblock for individuals who, although very technically competent, otherwise not willing to learn a skill that they believe is obsolete, and would not use.

I agree with some commentors, that obtaining the Extra Class License is too easy. In my opinion, the Extra Class License should require two years as a General Class Licensee, before being able to qualify for an Extra Class License. I have, over the years seen many "instant experts" who go from no license to the Extra Class in one testing session. This lessons the prestige of the top license. The few hundred kilohertz of bandwidth on the HF bands is little distinction. I realize that this argument is not covered by this NPRM, but should be considered at some point.

I applaud the FCC staff for the obvious effort put forth in this NPRM. I urge the Commission to ratify these proposed rule changes at the earliest possible date after close of the comment period.

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